August 20, 2021

**MEMORANDUM**

To: Bob Sivinski, OMB

From: Rachel Hansen, NCES

Through: Carrie Clarady, NCES

Re: School Pulse Panel Preliminary Activities Change Request (OMB# 1850-0963 v.3)

The requested Emergency Clearance for the School Pulse Panel Preliminary Activities (OMB# 1850-0963) was approved by OMB in June 2021 and was posted on the Federal Register for public review (the 30D public comment period expired on July 12, 2021). About 1200 public elementary, middle, high, and combined-grade schools will be selected to participate in a panel where school and district staff will be asked to provide requested data monthly during the 2021-22 school years. In addition, a reserve sample of replacement schools were selected to boost response rates if any schools from the initial sample do not respond. This approach provides the ability to collect detailed information on various topics while also assessing changes in reopening efforts over time. Given the high demand for data collection during this time, the content of the survey may change on a quarterly basis. The first step of this data collection effort is gaining compliance from sampled districts and schools, and this emergency request package will allow researchers to immediately begin contacting districts and schools to construct the panel of respondents and collect preliminary information.

The purpose of this Change Request is to update the burden estimate in the recruitment materials (including the special district generic application and letters/emails) to a more accurate estimated time for completion. The burden estimate will be updated from “4-5 hours” to “2-3 hours” and “240 minutes” to “180 minutes” throughout recruitment and communications materials. Additionally, we have updated the special district generic application to more prominently refer to the reserve sample with replacement schools as these districts will have reserve sample schools (these districts were not contacted in the initial invitations). Finally, in this change request we are submitting responses to public comments that were submitted during the 30D comment period that accompanied the original Emergency Clearance.

We are proposing the reduction in burden for the following reasons. First, we initially expected to have enough content that would cover 4-5 hours of data collection. At the time of submitting the recruitment package, we did not have a full set of items or an instrument drafted and we wanted to overestimate rather than underestimate the amount of time required to respond. However, after receiving the content priorities from various stakeholders, developing items, and drafting the instrument, we’ve determined that we do not have as many burden-heavy item types (i.e., administrative data) as anticipated. Second, while several stakeholders requested the tracking of federal relief funds as a high content priority, cognitive interviews with principals informed us that these items are just not suitable for school-level staff to respond to. While we are encouraging school staff to work with district staff in responding, we are not requiring it and we are concerned that the quality of information reported could be poor depending on the respondent for those items. Additionally, we learned of another U.S. Department of Education data collection effort focused on federal relief funds that is a mandatory, universe collection (the Education Stabilization Fund-Elementary and Secondary School Emergency Relief Fund (ESSER I/ESSER II/ARP ESSER Fund) Recipient Data Collection Form (Agency/Docket number: [ED-2021-SCC-0096](https://beta.regulations.gov/docket/ED-2021-SCC-0096)) and opted to remove this section from the School Pulse Panel instrument to reduce duplication of content. Finally, the response rate for this study has been very low to date, and cognitive interviews have suggested that decreasing the amount of time for the data collection may make schools and districts more eager to participate. For these reasons, we’re proposing to continue recruitment and communications with schools and districts using a burden estimate of 2-3 hours rather than 4-5 hours.

NCES previously requested an emergency clearance to allow us to comply with the January 21, 2021 [Executive Order on Supporting the Reopening and Continuing Operation of Schools and Early Childhood Education Providers](https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/21/executive-order-supporting-the-reopening-and-continuing-operation-of-schools-and-early-childhood-education-providers/), which states that the Department of Education must “coordinate with the Director of the Institute of Education Sciences to facilitate, consistent with applicable law, the collection of data necessary to fully understand the impact of the COVID-19 pandemic on students and educators, including data on the status of in-person learning. These data shall be disaggregated by student demographics, including race, ethnicity, disability, English-language-learner status, and free or reduced lunch status or other appropriate indicators of family income.” The National Center for Education Statistics (NCES), in the Institute of Education Sciences of the U.S. Department of Education, will oversee the survey collection, which is designed to collect vital data with the least possible burden on schools. With the voluntary participation of educators and school leaders across the country, NCES will be able to report the percentages of students who received instruction remotely, in-person, or in a hybrid instructional mode for selected districts, states, and the nation. NCES will provide these data for various student groups, in addition to information about attendance rates, in an online dashboard.

The costs to the government have not changed as a result of this amendment, but because our estimated response rates were low and we are increasing our sample size as a result, our burden estimates have been revised. In addition to the changes mentioned above, detailed summaries of the changes to the supporting documents are below and across following pages.

# Part A

## A.1.4 Study Design

The U.S. Census Bureau will collect the School Pulse Panel data on behalf of NCES. The School Pulse Panel will be a self-administered, online survey (as built in Qualtrics). ~~There will be two components to the full online survey: 1) a district-level component focused on administrative data and 2) a school-level component focused on attitudinal questions and questions best asked of staff with more direct knowledge of day-to-day operations.~~ It is estimated for the survey (both components) to require a total of about ~~4~~ 2-3 hours of district and school staff time.

The district of the sampled school will be offered a reimbursement of a total of $5,000 for their participation in the study over the course of 12 months. This will be in the form of a loaded debit card with $1,250 that will be sent to the district after the first three months of collections, and then money will be added to the card on a quarterly basis throughout the school year. Principals, or the school staff most knowledgeable about COVID-19 impacts on the school environment and instructional offerings, can complete the school-level component and a district-level component will be available to be completed by district staff should the school prefer that flexibility in responding. No classroom time is involved in the completion of this survey.

The School Pulse Panel will provide aggregate estimates for public schools across the nation. A stratified sample design will be used to select approximately 1,200 U.S. public schools. In addition, a reserve sample of replacement schools was selected to boost response rates if any schools from the initial sample do not respond. The sample is designed to provide national estimates of primary, middle, and high schools taking into account the type of locale (urbanicity) and racial/ethnic student enrollment.

## A.2.1 Research Issues Addressed in the School Pulse Panel

1. ~~Federal relief fund use~~
	1. ~~How are American Rescue Plan funds being used to assist with:~~
		1. ~~Virtual learning?~~
		2. ~~Safety precautions?~~
		3. ~~Activities to support students?~~
2. **~~VI.~~** Special education and mental health services provided
	1. Have there been challenges to meeting IEP requirements?
	2. Have there been changes in special education teacher counts since over the course of the pandemic?
	3. What mental health services are provided for students, teachers, and staff?
	4. Have there been change in counts of school psychologists, counselors, and nurses over the course of the pandemic?
3. **~~VII.~~** Staffing
	1. As of the start of the 2021-22 school year, do you have any administrative staff, teacher, or support staff vacancies?

## A.10 Assurance of Confidentiality

*According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this voluntary information collection is 1850-NEW. The time required to complete this information collection is estimated to average ~~240~~ 180 minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate, suggestions for improving this collection, or comments or concerns about the contents or the status of your individual submission of this questionnaire, please e-mail: XXX@census.gov.*

## A.12 Estimated Response Burden

The total response burden estimate for special district approvals is based on 360 minutes for review by one staff member, and 60 minutes per member for special district panel review, assuming each panel would on average be composed of six panel members. Based on the estimated hourly rates for principals/administrators of $49.52[[1]](#footnote-2), and based on ~~3,086~~ 3,072 total burden hours for the School Pulse Survey preliminary activities, the total estimated burden time cost to respondents is ~~$152,819~~ $152,125.

**Table 1. Estimates of respondent burden for preliminary field activities**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Activity** | **Sample Size** | **Estimated Response Rate** | **Estimated Number of Respondents** | **Estimated Number of Responses** | **Average Burden Time per Respondent (Minutes)** | **Total Burden Hours** |
| **Preliminary Activities** |
| District IRB Staff Review | 300 | 80% | 240 | 240 | 360 | 1,440 |
| District IRB Panel Review | 300\*6 | 80% | 1,440 | 1,440 | 60 | 1,440 |
| Notification email – District respondent | 900 | 80% | 720 | 720 | 3 | 36 |
| 8 item questionnaire – District respondent | 900 | 80% | 720ª | 720 | 10 | 120 |
| Notification letter – Schools respondent | ~~1,200~~2,400 | ~~83%~~30% | ~~1,000~~720 | ~~1,000~~720 | 3 | ~~50~~36 |
| ***Total Preliminary Activities*** | ***--*** | ***--*** | ***~~3,400~~******3,120*** | ***~~4,120~~******3,940*** | ***--*** | ***~~3,086~~******3,072*** |

ªNot a unique respondent; duplicate of the row above

The initial district estimate was inflated to account for the addition of the reserve sample and is still an acceptable estimate for respondent burden.

# Part B

## B3. Methods to Maximize Response Rates

NCES is committed to obtaining a high response rate in the SPP. In general, a key to achieving a high response rate is to track the response status of each sampled district and school, with telephone follow-up, as well as follow-up by e-mail, of those schools that do not respond promptly. To help track response status, survey responses will be monitored through an automated receipt control system.

It is estimated that the survey (both components) will require a total of about ~~4~~ 2-3 hours of combined district and school staff time each month. To encourage study participation, the district of each sampled school will be offered a reimbursement of a total of $5,000 for their participation in the study over the course of 12 months.

# Appendix A

## LEA Research Application Cover Letter

[Name] [Date]

[Position, Department]

[School District]

[Street Address]

[City, State, Zip]

Dear [District Contact]:

The National Center for Education Statistics (NCES) of the U.S. Department of Education is requesting approval to conduct the new **School Pulse Panel** in some of your Local Education Agency (LEA)’s schools during the 2021-22 school year.

The **School Pulse Panel** is a new study in direct response to President Biden’s Executive Order 14000: Supporting the Reopening and Continuing Operation of Schools and Early Childhood Education Providers. It will collect extensive data on issues concerning the impact of the COVID-19 pandemic on students and staff in U.S. public primary, middle, high, and combined-grade schools, and will be one of the nation’s few sources of reliable data on a wealth of information focused on school reopening efforts, virus spread mitigation strategies, services offered for students and staff, and technology use, as reported by school LEA staff and principals in U.S. public schools. The survey will ask LEA staff and sampled schools about topics such as instructional mode offered; enrollment counts of subgroups of students using various instructional modes; learning loss mitigation strategies; safe and healthy school mitigation strategies; special education services; use of technology; ~~use of federal relief funds;~~ and information on staffing.

The **School Pulse Panel** is administered by the U.S. Census Bureau on behalf of NCES. Its data ~~will be~~ is crucial in helping legislators and education leaders make informed decisions to improve education. About 1200 public elementary, middle, high, and combined-grade schools ~~will be~~ were selected to participate in the initial panel where school and LEA staff are asked to provide requested data monthly during the 2021-22 school years. In addition, a reserve sample of replacement schools were selected to ensure dependable response rates in the event of nonresponse from schools in the initial sample. The responses from your LEA’s sampled schools represent the concerns of similar schools that were not sampled, both within and outside of your LEA.

[*For LEAs where sample has been drawn, insert:* “From your LEA, XX schools were ~~sampled~~ selected as possible replacement schools for the SPP.”] **No student or classroom time is involved** **in this survey.**

If permitted to by the district and selected to participate ~~by~~ in the ~~LEA~~ SPP, the school will be offered up to a total reimbursement of $5,000 for participation in the study over the course of 12 months (this includes September 2021 through August 2022). The reimbursement will be paid out quarterly to the LEA in the form of a debit card and will be prorated to include the dollar amount that reflects the number of months of participation for that quarter.

Thank you for your consideration of the research application for the **School Pulse Panel**. The enclosed application and materials describe the purposes, survey topics, sample sizes, and respondent burden for SPP. In addition, an LEA Approval Form is enclosed for you to indicate whether your district has approved participation in SPP. **Due to extreme time constraints, we are seeking a decision within one week of submission.** The Secretary of Education, Dr. Miguel Cardona, has contacted your LEA’s Superintendent regarding this study.

If you have any questions about the **School Pulse Panel** or the research application, please contact the study’s LEA research application team, by e-mail at ~~xxx~~ addp.school.pulse.panel@census.gov or by telephone at 1- ~~800-221-1204~~ 844-868-3661.

Sincerely,

~~James L. Woodworth~~ Peggy Carr, PhD

Commissioner

National Center for Education Statistics

PCP, 550 12th St., SW, 4th floor~~, Room 4032~~

Washington, DC 20202

## School Pulse Panel Generic Research Application

(pp 7-8). The administration of the SPP is in direct response to President’s Executive Order 14000: Supporting the Reopening and Continuing Operation of Schools and Early Childhood Education Providers. It will be one of the nation’s few sources of reliable data on a wealth of information focused on school reopening efforts, virus spread mitigation strategies, services offered for students and staff, and technology use, as reported by LEA staff and principals in U.S. public schools. About 1,200 public elementary, middle, high, and combined-grade schools ~~will be~~ were selected to participate in ~~a~~ the initial panel where school ~~and LEA~~ staff are asked to provide requested data monthly during the 2021-22 school years. In addition, a reserve sample of replacement schools were selected to boost response rates if any schools from the initial sample do not respond. This approach provides the ability to collect detailed information on various topics while also assessing changes in reopening efforts over time. Given the high demand for data collection during this time, the content of the survey may change on a quarterly basis and 5 to 10 minutes of content may change monthly. By participating, information from school(s) in your LEA allows for comparisons among different types of schools across the nation that are valuable to governing agencies, policy makers, educators and the general public.

(p. 8) The School Pulse Panel will be a dynamic monthly survey and content will change based on what we learn over time from your school and LEA. The monthly survey may have a LEA-level component and a school-level component. These components will encompass broad content domains, each with a series of measurement items addressing a specific research question. Each content domain is briefly stated below in terms of the issues in need of measurement, as well as the research questions we are seeking to answer. The final instrument for September data collection is available and will be provided with our application. ~~At the time of submission of this application, content domains have been developed but items are still being drafted and tested.~~ Below are examples of the types of content domains and corresponding research questions that may be included in subsequent survey months:

1. ~~Federal relief fund use~~
	1. ~~How are American Rescue Plan funds being used to assist with:~~
		1. ~~Virtual learning?~~
		2. ~~Safety precautions?~~
		3. ~~Activities to support students?~~
2. **~~VI.~~** Special education and mental health services provided
	1. Have there been challenges to meeting IEP requirements?
	2. Have there been changes in special education teacher counts since over the course of the pandemic?
	3. What mental health services are provided for students, teachers, and staff?
	4. Have there been change in counts of school psychologists, counselors, and nurses over the course of the pandemic?
3. **~~VII.~~** Staffing
	1. As of the start of the 2021-22 school year, do you have any administrative staff, teacher, or support staff vacancies?

### Questionnaire

A copy of the September instrument will be submitted with our application. ~~At of the date of submission the questionnaire for this study has not been finalized. A copy can be provided as soon as a draft version is available. Additional information about SPP is available at TBD.~~

### Methodology and Sampling

The U.S. Census Bureau will collect the SPP data on behalf of NCES. Data collection will be a self-administered, online survey. ~~There will be two components to the online survey: 1) a LEA-level component focused on administrative data and 2) a school-level component focused on attitudinal questions and questions best asked of staff with more direct knowledge of day-to-day operations.~~ It is estimated for the survey to require ~~a total of about 4-5~~ roughly 2-3 hours of staff time each month. However, this estimated time to complete can be greatly reduced by having other school and/or district staff help with the response, which is encourage. For example, items asking for enrollment counts could be pulled from administrative data systems quickly. The sampled school is welcome to share the invitation link with other staff to help respond to the survey. The sampled school ~~and its LEA~~ will be offered up to a total reimbursement of $5,000 for their participation in the study over the course of 12 months (including September 2021 through August 2022). The reimbursement will be paid out quarterly in the form of a debit card and will be prorated to include the dollar amount that reflects the number of months of participation for that quarter. If a school district does not permit its schools to receive any form of payment, the reimbursement will be sent to a point of contact in the district or the reimbursement will be withheld. ~~To streamline the delivery of the reimbursement, a debit card will be sent to a designated LEA contact after the first quarter of collections has been completed. This initial debit card will have $1,250 loaded onto the card. An additional $1,250 will be loaded onto the same card after each quarter of data collection.~~ Principals,~~or the school~~ and other staff most knowledgeable about COVID-19 impacts on the school environment and instructional offerings, can complete the ~~school level component~~ survey. No classroom time is involved in the completion of this survey.

The resulting data will provide aggregate estimates for public schools across the nation. A stratified sample design ~~will be~~ was used to select approximately 1,200 U.S. public schools. In addition, a reserve sample of replacement schools were selected to boost response rates if any schools from the initial sample do not respond. The sample is designed to provide national estimates of primary, middle, and high schools taking into account the type of locale (urbanicity) and racial/ethnic student enrollment.

### Response Burden

Every effort is made to create a survey that collects in-depth data without putting an undue burden on the respondent. It is intended for this collection to provide flexibility in reporting based on the type of data. For example, LEA staff can pull from administrative data systems to provide subgroup counts. The total response burden for the survey is estimated to be not more than ~~a total of~~ ~~240~~ 180 minutes each month. This burden can be shared (and is encouraged to be shared) between school and district staff.

### Confidentiality

(p. 11) The following language will be included on data collection instruments:

*According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this voluntary information collection is 1850-0761. The time required to complete this information collection is estimated to average ~~240~~180 minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate, suggestions for improving this collection, or comments or concerns about the contents or the status of your individual submission of this questionnaire, please e-mail: ~~TBD~~* addp.school.pulse.panel@census.gov*.*

# Appendix B

In all communication materials, the phrase “4-5 hours” was replaced by “2-3 hours”. Otherwise, all communication materials are unchanged.

1. The average hourly earnings of principals/education administrators in the May 2020 National Occupational and Employment Wage Estimates sponsored by the Bureau of Labor Statistics (BLS) is $49.52. Source: BLS Occupation Employment Statistics, http://data.bls.gov/oes/ Occupation code: Education Administrators, Elementary and Secondary Schools (11-9032); Annual Mean Wage $103,010/2080 hours. Accessed on May 17, 2021. [↑](#footnote-ref-2)